

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF SETH
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Lead Counsel and Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude the Opinions of David Madigan, Ph.D.
2. Attached hereto as Exhibit A is a true and accurate copy of Plaintiffs' Designation of Experts and Opinion Testimony, served in MDL 2875 on July 12, 2021.
3. Attached hereto as Exhibit B is a true and accurate copy of Dr. Madigan's Expert Report served in MDL 2875.
4. Attached hereto as Exhibit C is a true and correct copy of the transcript of the deposition of David Madigan, Ph.D., in MDL 2875, dated August 5, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of the Rule 26 Expert Report of Dipak Panigrahy, MD, dated July 6, 2021, served in MDL 2875.

6. Attached hereto as Exhibit E is a true and correct copy of Plaintiffs' Disclosure of Cancer Types, Dkt. 706 in MDL 2875.

7. Attached hereto as Exhibit F is a true and correct copy of "N-Nitrosodimethylamine-Contaminated Valsartan and the Risk of Cancer" by W. Gomm, et al.

8. Attached hereto as Exhibit G is a true and correct copy of "Use of N-nitrosodimethylamine (NDMA) contaminated valsartan products and risk of cancer: Danish nationwide cohort study" by A. Pottegard, et al.

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, *Lead Counsel and*
Liaison Counsel for Defendants
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Dated: November 1, 2021